

**IN THE UNITED STATES DISTRICT COURT
FOR THE STATE OF DELAWARE**

| | | |
|---------------------------------|---|---------------------------|
| KERRY JOHNSON and |) | |
| SHARON ANDERSON, |) | |
| on behalf of themselves and all |) | |
| others similarly situated, |) | |
| |) | |
| Plaintiffs, |) | C.A. No. 1:06-cv408 (JJF) |
| |) | |
| |) | |
| v. |) | |
| |) | |
| GOVERNMENT EMPLOYEES |) | NON-ARBITRATION |
| INSURANCE COMPANY, |) | |
| GEICO CASUALTY COMPANY, |) | TRIAL-BY JURY DEMANDED |
| GEICO GENERAL INSURANCE |) | |
| COMPANY, and GEICO INDEMNITY |) | |
| COMPANY, |) | CLASS ACTION |
| |) | |
| Defendants. |) | |

NOTICE OF 30(B)(6) DEPOSITION

TO:

BY HAND DELIVERY

Dawn L. Becker, Esquire
Gary Alderson, Esquire
LAW OFFICES OF DAWN L. BECKER
Citizens Bank Center
919 Market Street, Suite 725
Wilmington, DE 19801

BY FIRST CLASS MAIL

George M. Church, Esquire
Laura A. Cellucci, Esquire
MILES & STOCKBRIDGE P.C.
10 Light Street
Baltimore, MD 21202

PLEASE TAKE NOTICE that pursuant to District Court Rule 30(b)(6), the Plaintiffs will take the deposition upon oral examination of the person designated by Defendants with respect to the topics set forth in Exhibit A. The deposition will take place on January 29, 2008, commencing at 9 a.m. at the offices of Miles & Stockbridge P.C., 10 Light Street, Baltimore, Maryland, or such other date or at such other time or place as may be agreed upon by the parties or ordered by the Court. The deposition will be recorded by stenographic means.

Dated: January 14, 2008
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon
Richard H. Cross, Jr. (No. 3576)
Christopher P. Simon (No. 3697)
Kevin S. Mann (No. 4576)
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Attorneys for Plaintiffs

EXHIBIT A

- Categories of information available on any and all databases kept by Defendants or their agents regarding PIP claims (i.e., claims submitted by insureds in accordance with 21 Del. C. §2118B) (the “Databases”)
- Format(s) in which Databases are maintained (SQL, XML, . . .)
- Size of each Database
- Present ability to query and/or organize the Databases (i.e., what programs or processes are in place and how information can be retrieved, such as Boolean searches, sorting, . . .)
- Other information concerning PIP claims that is available in an electronic format
- Information only available through paper files
- Where and how paper files are organized and stored
- How Defendants determined that in a five year period they had paid \$19,762,596 to a total of 4,279 Delaware claimants